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ALLIANCES IN MEXICO
AND SRI LANKA

July 26, 2021

VIA ECF

The Honorable Thomas Vanaskie
Special Discovery Master
Stevens & Lee

**Re: *In re Valsartan, Losartan, and Irbesartan Products Liability
Litigation*, Case No. 1:19-md-02875-RBK-KW**

Dear Judge Vanaskie:

We write on behalf of Defendants Zhejiang Huahai Pharmaceutical Co., Ltd. (“ZHP”), Princeton Pharmaceutical Inc. (“Princeton”), Huahai U.S. Inc. (“Huahai U.S.”) and Solco Healthcare US, LLC (“Solco”, and collectively with ZHP, Huahai U.S., and Princeton, “the ZHP Parties”) to respectfully request that the Court deny Plaintiffs’ request to file a reply brief in further support of their motion regarding the ZHP Parties’ alleged waiver of certain confidentiality designations. *See* letter from Adam Slater dated July 23, 2021 (ECF No. [1406](#)).

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July 26, 2021
Page 2

Special Master Order (“SMO”) 31 is clear that Plaintiffs’ brief was due by July 14, 2021. *See* ECF No. [1376](#) (“Plaintiffs shall file a brief in support of their position ... no later than July 14, 2021.”). Plaintiffs did not comply with this Court-ordered deadline, nor did they seek consent from the ZHP Parties or the Court to file their brief out of time. It is for the Court, not the ZHP Parties, to determine whether to excuse Plaintiffs’ delay under Federal Rule of Civil Procedure 6(b)(1)(B). Nor was the ZHP Parties’ request for a two-day extension for their opposition brief an after-the-fact “consent” to Plaintiffs’ late filing. That request was to preserve their right to have six days to respond to the merits of Plaintiffs’ brief, not to bless Plaintiffs’ violation of the Court-ordered deadline.

Should the Court grant Plaintiffs’ request to file a reply brief, the ZHP Parties respectfully request that any such brief be limited solely to the issue of Plaintiffs’ late filing based upon the representation of Plaintiffs’ counsel in his letter to the Court on this issue. *See* ECF No. [1406](#).

We thank the Court for its courtesies and consideration of this request.

Respectfully submitted,

/s/ Seth A. Goldberg

Seth A. Goldberg

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July 26, 2021
Page 3

cc: Adam Slater, Esq. (*via email, for distribution to Plaintiffs' Counsel*)